UNITED STATES DISTRICT COURT

United States Courts Southern District of Texas FILED

SOUTHERN DISTRICT OF TEXAS

MAY 08 2019

HOUSTON DIVISION

David J. Bradley, Clerk of Court

UNITED STATES OF AMERICA

v.

JAMES PAXTON JEFFERSON, Defendant. UNDER SEAL

CRIMINAL No.

19 CR 337

INDICTMENT

THE GRAND JURY CHARGES THAT:

Count One

On or about December 13, 2018, in the Houston Division of the Southern District of Texas,

JAMES PAXTON JEFFERSON,

the defendant herein, knowingly made false statements and representations to the Federal Firearms Licensee, Zeroed in Armory, LLC, which was licensed under the provisions of Chapter 44 of Title 18, United States Code, with respect to information required by the provisions of Chapter 44 of Title 18 of the United States Code to be kept in the records of the Federal Firearms Licensees, in that the defendant executed a Bureau of Alcohol, Tobacco, and Firearms Form 4473 (Firearms Transaction Record) and provided a false residential address, which he knew was not his current address, in order to purchase one (1) Barrett .50 caliber rifle, and two (2) Century Arms International 7.62 x 39mm caliber rifles.

In violation of Title 18, United States Code, Section 924(a)(1)(A).

Count Two

On or about April 8, 2019, in the Houston Division of the Southern District of Texas,

JAMES PAXTON JEFFERSON,

the defendant herein, knowingly made false statements and representations to the Federal Firearms

Licensee, Zeroed in Armory, LLC, which was licensed under the provisions of Chapter 44 of Title 18, United States Code, with respect to information required by the provisions of Chapter 44 of Title 18 of the United States Code to be kept in the records of the Federal Firearms Licensees, in that the defendant executed a Bureau of Alcohol, Tobacco, and Firearms Form 4473 (Firearms Transaction Record) and provided a false residential address, which he knew was not his current address, in order to purchase twelve (12) Century Arms International 7.62 x 39mm caliber rifles.

In violation of Title 18, United States Code, Section 924(a)(1)(A).

Count Three

On or about April 12, 2019, in the Houston Division of the Southern District of Texas,

JAMES PAXTON JEFFERSON,

the defendant herein, knowingly made false statements and representations to the Federal Firearms Licensee, Zeroed in Armory, LLC, which was licensed under the provisions of Chapter 44 of Title 18, United States Code, with respect to information required by the provisions of Chapter 44 of Title 18 of the United States Code to be kept in the records of the Federal Firearms Licensees, in that the defendant executed a Bureau of Alcohol, Tobacco, and Firearms Form 4473 (Firearms Transaction Record) and provided a false residential address, which he knew was not his current address, in order to purchase one (1) Barrett .50 caliber rifle.

In violation of Title 18, United States Code, Section 924(a)(1)(A).

Count Four

On or about April 18, 2019, in the Houston Division of the Southern District of Texas,

JAMES PAXTON JEFFERSON,

the defendant herein, knowingly made false statements and representations to the Federal Firearms Licensee, Zeroed in Armory, LLC, which was licensed under the provisions of Chapter 44 of Title 18, United States Code, with respect to information required by the provisions of Chapter 44 of Title 18 of the United States Code to be kept in the records of the Federal Firearms Licensees, in that the

defendant executed a Bureau of Alcohol, Tobacco, and Firearms Form 4473 (Firearms Transaction Record) and provided a false residential address, which he knew was not his current address, in order to purchase one (1) Barrett .50 caliber rifle.

In violation of Title 18, United States Code, Section 924(a)(1)(A).

A TRUE BILL:

Original Signature on File

RYAN K. PATRICK United States Attorney

By:

Assistant United States Attorney